

June 4th, 2014

Re: 2013 House Bill 4688: Repeal some occupational licensure mandates

Dear Chairman Rocca and Regulatory Reform Committee Members,

This letter on behalf of the Michigan Association of Naturopathic Physicians (MANP) (michnd.org) is to support the passage of House Bill 4688, an Act to repeal Public Act 333 of 2006, a law that imposes a licensure mandate on dietitians and nutritionists. The mandate has not been enforced since it was authorized in 2006 because the state licensure agency was unable to devise acceptable credentialing and education requirements.

As a professional association we stand unopposed to the pursuit of licensure by occupations that provide health services, including dietetics and nutrition care services, to the public. However, we believe that the restriction upon delivery of "dietetics and nutrition care services" as stated in PA 333 creates a requirement for naturopathic physicians- and other doctoral-level nutrition professionals- to seek licensure under PA 333 in order to continue delivering dietetics and nutrition care services to Michiganders.

According to the law, the requirement for nutrition professionals to become licensed shall be administered "as prescribed in rules promulgated by the department," however, to date, the Dietetics and Nutrition Board has been unable to faithfully discharge its duty to promulgate such rules.

As health professionals, we believe that dietetics and nutrition care services are an integral part of individualized and progressive healthcare. However, the current law is over-reaching in its attempt to restrict highly trained, yet unlicensed, professionals from delivering dietetics and nutrition care services to those professionals approved by the commission on dietetic registration.

As a profession, naturopathic physicians are beholden to upholding the standards of our own accredited academic institutions, and other regulatory bodies. The future of healthcare lies in an integrative approach positively impacting nutrition-related behavior, health risk factors and health status of the community. PA 333 hinders the integration of nutritional counseling in multiple health disciplines by effectively restricting the delivery of dietetics and nutrition care services to registered dietitians.

We respectfully request your 'YES' vote in favor of HB 4688, to repeal Public Act 333 of 2006, and dissolve the Michigan Dietetics and Nutrition Board.

Sincerely,

Kelly Hassberger, ND

President – Michigan Association of Naturopathic Physicians